

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
ZULKIA MALDONADO :
DEBTOR :
: **BANKRUPTCY NO.: 19-17645- PMM**

RESPONSE TO CERTIFICATION OF DEFAULT

Debtor ("Respondent"), by their attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Debtor has made or will make all payments required under her mortgage.
2. Debtor requesting a hearing at which, she will, if necessary, provide proof of said payments.

WHEREFORE, Debtor prays that a hearing be set on this matter.

Date: September 19, 2023

/s/ Brandon J. Perloff
Brandon J. Perloff Esquire.
Attorney for Debtor